

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

---

ROSWELL PARK COMPREHENSIVE CANCER  
CENTER; CANDACE JOHNSON, Ph.D., in her  
individual and professional capacities; RENIER  
BRENTJENS, M.D., Ph.D., in his individual and  
professional capacities; CARL MORRISON, M.D.,  
DVM, in his individual and professional capacities;  
JOHN KANE III, M.D., in his individual and  
professional capacities; and ERROL DOUGLAS,  
Ph.D., in his individual and professional capacities,

Movants,

v.

ANNE GRAND'MAISON, M.D.,

Respondent.

---

Case In Other Court:  
Case No. 1:23-cv-00099  
(W.D.N.Y.)

Civil No.: 1:23-mc-00243

**JOINT STIPULATION EXTENDING  
NON-PARTY KALEIDA HEALTH'S TIME TO RESPOND TO  
OR OTHERWISE MOVE WITH RESPECT TO NON-PARTY SUBPOENA**

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned counsel, that the time for non-party Kaleida Health to respond to or otherwise move with respect to the non-party subpoena purportedly served on it by Respondent, Anne Grand'Maison, M.D., (the "Subpoena") in a related case filed in the Western District of New York, Case No. 1:23-cv-00099 (the "Originating Action") is hereby held in abeyance pending entry of a Confidentiality Order in the Originating Action.

IT IS FURTHER STIPULATED AND AGREED that, once the Confidentiality Order referenced above is filed and entered in the Originating Action, counsel to Dr. Anne Grand'Maison, M.D. shall promptly reach out to counsel to Kaleida Health and agree upon a new return date for Kaleida Health to respond to or otherwise move with respect to the Subpoena in this Court and/or in the Originating Action, and counsel shall inform this Court of such date via letter motion.

Dated: August 1, 2023

**WIGDOR LLP**

*Attorneys for Respondent,  
Anne Grand'Maison, M.D.*

By: s/Laura E. Edidin (with permission)

David E. Gottlieb

Laura E. Edidin

85 Fifth Avenue, 5th Floor  
New York, New York 10003  
Telephone: (212) 257-6800  
[dgottlieb@wigdorlaw.com](mailto:dgottlieb@wigdorlaw.com)  
[ledidin@wigdorlaw.com](mailto:ledidin@wigdorlaw.com)

Dated: August 1, 2023

**HODGSON RUSS LLP**

*Attorneys for Non-Party Kaleida Health*

By: s/James J. Zawodzinski, Jr.

Julia M. Hilliker

James J. Zawodzinski, Jr.

The Guaranty Building  
140 Pearl Street, Suite 100  
Buffalo, New York 14202  
Telephone: (716) 856-4000  
[jhillike@hodgsonruss.com](mailto:jhillike@hodgsonruss.com)  
[jzawodzi@hodgsonruss.com](mailto:jzawodzi@hodgsonruss.com)

**SO ORDERED**



Honorable Paul G. Gardephe  
United States District Court Judge

Dated: August 3, 2023